

PELUSO & TOUGER, LLP

ATTORNEYS AT LAW
70 LAFAYETTE STREET
NEW YORK, NEW YORK 10013

TELEPHONE: (212) 608-1234
FACSIMILE: (212) 513-1989

VIA ECF

September 26, 2017

Honorable Ronnie Abrams
United States District Court Judge
United States Courthouse
40 Foley Square
New York, New York 10007

Re: United States v. John Galanis,
16 CR 371 (RA)

Your Honor,

I am writing on Mr. Galanis' behalf to respectfully request an adjournment of the October 2, 2017 motions deadline in the above case. I also join in the letter submitted by each of my co-counsel asking for the same relief.

As mentioned in each of the adjournment requests, counsels are diligently attempting to review the Discovery in this case. To say that the Discovery in this case is voluminous is a vast understatement of reality. The Discovery contains over 3 million documents. Some of which we have only recently received. It is easy for the government to say that the defense has had these documents for a long time and thus should be ready to proceed because they have had the documents for a lot longer than the defense has. We are only asking for the ability to be on equal footing as the government, meaning that we be given a chance to peruse the entire Discovery just as the government has had the chance to do. I am sure I speak for all counsel when I say that we are not avoiding doing the work, it is just very time consuming and we need the time to do it. The letter submitted earlier today by counsels for Archer and Cooney and other co-counsel further explains why the government's statement that we have been in possession of the discovery for "almost a year and a half" is disingenuous.

The government also argues that Mr. Galanis has no basis to raise any issue related to the Archer/Cooney search warrant. That is wrong. The emails may give rise to motions by Mr. Galanis and other defendants, such as motions for severance – a distinct possibility in a case where five of the seven defendants remain in the case. But the defense is in no position to evaluate the feasibility of any such motions without first receiving all of the discovery.

Further, I agree with co-counsel that it makes no sense to proceed with piecemeal motions. The government should simply move expeditiously to produce the remainder of the discovery and then, as is the normal course in every case, the defense should have an opportunity to make motions based on the evidence the government has produced.

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Accordingly, and for the reasons stated in our original motion, we respectfully request that the Court adjourn the October 2, 2017 motions deadline. Thank you for your attention to this matter.

Respectfully yours,



David Touger

cc: All counsel via ECF